

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SAMPSON PEARSON

Defendant.

**3:19CR-169-MOC**

**UNOPPOSED MOTION TO CONTINUE TRIAL DATE**

Sampson Pearson, (“Mr. Pearson”) by and through his counsel of record, KEVIN A. TATE, Senior Litigation Counsel, FPD-WDNC, respectfully requests that this Court continue the time for commencement of trial pursuant to the applicable provisions of 18 U.S.C. § 3161. As grounds therefore, it is averred:

1. This matter is currently scheduled for Status Conference on **July 1, 2020 at 12:30 p.m., and docket call July 20, 2020 at 9:30AM** before this court.

2. Undersigned counsel is *successor counsel* for Mr. Pearson. He is out of custody and resides more than 3 hours away in Manning, South Carolina. This District’s Standard Discovery Order requires that certain discovery be personally reviewed, in the presence of counsel or staff, which precludes Mr. Pearson from receiving most of the discovery for review on his own time

3. In addition, due to the Covid-19 pandemic, undersigned counsel has been subject to administrative travel restrictions, as well as, the March 2020, initial travel restrictions in both the States of South and North Carolina. Consequently, undersigned counsel has been unable to meet personally to with Mr. Pearson to review discovery or discuss his case.

4. Undersigned counsel will need additional time to review discovery with Mr. Pearson, and otherwise prepare for trial. In the alternative, additional time is needed to research the legal and factual issues surrounding Mr. Pearson's criminal history in order to advise him of his likely sentencing outcome upon a plea, or in the event his convicted at trial.

5. For the foregoing reasons, the Government does not oppose this motion.

**WHEREFORE**, Sampson Pearson requests that the time of his trial be continued to this Court's next Criminal Term.

Respectfully submitted,

/s/ Kevin A. Tate

Kevin A. Tate

NC Bar No. 38548

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***Counsel for Sampson Pearson***

Dated: June 21, 2020